

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>In Re:</b>	:	
<b>SAMANTHA K NARANJO</b>	:	<b>Bankruptcy No. 23-12249-amc</b>
,		
<b>Debtor</b>	:	<b>Chapter 13</b>
<b>Freedom Mortgage Corporation</b>	:	
<b>Movant</b>	:	
	:	
	:	
v.	:	
<b>SAMANTHA K NARANJO</b>	:	
<b>and</b>		
<b>SCOTT F WATERMAN [Chapter 13], ESQUIRE</b>		
<b>(TRUSTEE)</b>		

<b>Respondent(s)</b>	:	
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**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S  
MOTION TO APPROVE LOAN MOD (DE 35)**

The undersigned hereby certifies that, as of January 18, 2024, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion to Approve Loan Mod.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion to Approve Loan Mod. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before January 15, 2024.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: January 18, 2024

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

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**Debtor** : **Chapter 13**  
**Freedom Mortgage Corporation** :  
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**SAMANTHA K NARANJO** :  
  
**and**  
**SCOTT F WATERMAN [Chapter 13], ESQUIRE**  
**(TRUSTEE)**  
  
**Respondent(s)** :

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on January 18, 2024 to the following:

SAMANTHA K NARANJO  
3225 BELGREEN ROAD  
PHILADELPHIA, PA 19154

BRAD J. SADEK, Debtor's Attorney  
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Philadelphia, PA 19102  
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SCOTT F WATERMAN [Chapter 13], Bankruptcy Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

Office of the U.S. Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
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